

EXHIBIT 1-C

SAMPLE MANAGEMENT PLAN FORMAT FOR A HOUSING PROJECT ADMINISTERED WITH THE ASSISTANCE OF A CONSULTANT

I. Administrative Structure

The City of _____ is an incorporated city with a Mayor-Council form of government. The following persons will have lead responsibility for administering the City's FY____ Community Development Block Grant (CDBG) housing and neighborhood revitalization project:

Mayor _____, as the City's chief elected official will have responsibility for all official contacts with the Montana Department of Commerce (DOC) and will serve as the Environmental Certifying Officer. The Mayor and Town Council will have ultimate authority and responsibility for the management of project activities and expenditure of CDBG funds. The final approval of all contracts and drawdown requests will be the responsibility of the City Council. (Telephone _____)

_____, Clerk-Treasurer, as the City's chief financial officer, will be responsible for management of, and record keeping for, the CDBG funds and other funds involved in the financing of the water project. One-fourth of this position's time will be devoted to CDBG administration during the term of the project. (Telephone _____)

_____, Consultant, will be designated as Project Manager and be responsible for overall project management and insuring compliance with applicable federal and State requirements for the CDBG project. The Project Manager will serve as the City's liaison with DOC for the project and will serve as the Labor Standards Officer. (Telephone _____)

_____, City Attorney, as the City's legal counsel, will review and advise the Mayor and Council regarding any proposed contractual agreements associated with the CDBG project and provide any other legal guidance as requested. (Telephone _____)

The Mayor and Clerk-Treasurer attended the DOC CDBG Administration Workshop.

II. Project Management

A. The Project Manager will be responsible for:

1. Preparing the Environmental Review Record (ERR) to assure full compliance with the National and Montana Environmental Policy Acts, completion of the statutory checklist, and any other applicable environmental requirements. The Project Manager will also be

responsible for preparing any legal notices required to be published for the ERR process and conducting any required public hearings or informational meetings.

2. Preparing a request for release of funds to DOC.
3. Developing a contract with DOC and assisting the City with all requirements related to effective project start-up and implementation.
4. Establishing and maintaining complete and accurate project files and preparing all documentation and reports incidental to administration of the grant.
5. Assuring compliance with applicable acquisition, civil rights, Section 504/ADA evaluation and labor standards requirements, including the preparation of an equal employment opportunity plan, an ADA compliance plan and a fair housing ordinance, which will be adopted by the City.
6. Reviewing all proposed project expenditures or requests for payment to ensure their propriety and proper allocation of expenditures to the CDBG budget.
7. In cooperation with the Clerk-Treasurer, processing payment requests and preparing drawdown requests to DOC, including the Request for Payment and Status of Funds Report and the Project Progress Report.
8. Preparing all required performance reports and closeout documents for submittal to DOC and assist the City with the selection of an independent auditor.
9. Attending City Council meetings to provide project status reports and representing the CDBG project at any other public meetings, as deemed necessary by the Mayor.
10. Under the supervision and with the assistance of local officials, administering and implementing the City's CDBG housing and neighborhood revitalization project, in accordance with all applicable state, federal, and local requirements, with responsibilities to include:
 - a. establishing, at the Consultant's expense, a local housing rehabilitation office, staffed full-time to provide complete housing rehabilitation services including:
 - assisting homeowners and landlords with applications;

- screening applicants for eligibility;
 - inspecting homes for needed rehabilitation and making recommendations to the project advisory committee;
 - assisting applicants with loan applications and coordinating the loan review process with the borrower and the applicant;
 - assisting recipients with contractor negotiations and bid awards;
 - preparation of contractor bid sheets; and
 - assuring title searches, credit reviews, and income verifications.
- b. in cooperation with the project advisory committee, developing a marketing strategy for the project to ensure a high level of participation by eligible households and performing public information activities, including preparation of newspaper advertisements and articles regarding the project; posters, and radio notices;
 - c. negotiating with private lenders and public agencies to stimulate additional housing investment in the project area;
 - d. coordinating services with other agencies, such as Montana Power, HRDC, Senior Citizens, and the county health and welfare departments, to achieve maximum impact upon the needs of low and moderate income households in the project area;
 - e. securing State Historic Preservation Office clearance for housing rehabilitation activities either by district designation or review of individual housing units;
 - f. providing technical assistance to the City for adoption of appropriate codes for the acquisition and/or demolition of unsafe and abandoned property;
 - g. conducting informational meetings for contractors and preparing lists of eligible contractors;
 - h. ensuring that proper inspections are performed, required permits are obtained, and lien waivers signed; and

- i. serving as staff for meetings of the project advisory committee.
- B. The Mayor will appoint a five-member project advisory committee to assist the City with the implementation of the housing rehabilitation project. The committee's responsibilities will include:
 1. assuring that the following certifications, plans, policies, and resolutions have been put in place:
 - Hatch Act Resolution;
 - Equal Employment Opportunity (EEO)/Nondiscrimination Policy;
 - Drug Free Workplace Policy;
 - Fair Housing Resolution; and
 - Section 504 and ADA Compliance Procedures
 2. assisting and providing guidance to the Project Manager relating to the implementation of the City's CDBG project;
 3. preparing terms for financial assistance including eligibility guidelines, loan terms, interest rates, and policies on the deferral of repayments (these policies will be adopted in final form by the City Council);
 4. reviewing applications for assistance and making recommendations on the form of assistance to be provided;
 5. considering alternatives and recommending actions to be taken in the event of complaints, homeowner-contractor disputes, inadequacy of work quality, or other issues affecting the project;
 6. assisting in the marketing of the project to the residents of the project area; and
 7. recommending administrative policies for the project to the City Council, for its adoption.

III. Financial Management

- A. The Clerk-Treasurer's responsibilities will be as follows:
 1. Establishing the CDBG bank account and transferring CDBG funds from that account to the town's treasury for disbursements, based on claims and supporting documents approved by the project manager, project engineer, and contractor. Since the City uses an interest bearing account for its general disbursements, a separate non-

interest bearing account will be used for CDBG funds. Balances in that account will not exceed \$5,000 for a period of three days.

2. Entering all project transactions into the City's existing accounting system (BARS), and prepare checks/warrants for approved expenditures.
 3. With the assistance of the Project Manager, preparing the Request for Payment and Status of Funds Reports to be submitted to DOC. All drawdown requests will be signed by two of the three following persons: Mayor, Clerk-Treasurer, and Council President. No expenditures will be made without the approval of the Council at a regular meeting.
 4. With the assistance of the Project Manager, preparing the final financial reports for project closeout.
- B. The Project Manager will review all proposed expenditures of CDBG funds and will prepare drawdown requests, which will be signed by the officials cited above. All disbursements will be handled in accordance with the City's established claim review procedures. Before submitting the claim to the Clerk-Treasurer, the Project Manager will attach a certification to each claim stating that the proposed expenditure is an eligible expense of the City's CDBG project and consistent with the project budget. The Council will review all claims before approving them.
- C. Financial record keeping will be done in conformance with the recommendations of the DOC/Local Government Services Bureau as described in Chapter 4 of the CDBG Administration Manual. The original financial documents (claims with attached supporting material) will be retained in the City's offices.
- D. To ensure timely payment of housing rehabilitation contractors, an escrow account will be established. Withdrawals from the escrow can be made by the Clerk-Treasurer, in accordance with signed approvals by the Project Manager.
- E. Weekly timesheets will maintained by the Project Manager and the Clerk-Treasurer to document all time worked on the CDBG project.
- F. The City's housing and neighborhood revitalization project will generate some program income from loan repayments and the sale of the sites of unsafe, abandoned property acquired and demolished through the CDBG project. Any program income received from these sources will be deposited in the City's established community development fund. Any program income received prior to project closeout will be used to assist additional households

with housing rehabilitation needs. The use of program income received after project closeout will be limited to those activities eligible under the CDBG program and will be determined at the discretion of the City Council.

A project implementation schedule, which outlines the basic steps and timetable involved in the management of the project, is attached.

SAMPLE
PROJECT SCHEDULE

A. START-UP

1.	Select Administrative Consultant	City Council	Jan	1997
2.	Attend DOC Workshop	City Council	Feb	1997
3.	Prepare Management Plan	City & Consultant	Feb	1997
4.	Establish Project Files	Consultant	Feb	1997
5.	Determine Audit Requirements	City	Feb	1997
6.	Schedule Local Government Audit	City	Mar	1997
7.	Complete ERR	Consultant ¹	Mar	1997
6.	Secure DOC Approval of RROF	Consultant	Apr	1997

B. IMPLEMENTATION

1.	Start Acquisition Process	Consultant & City	May	1997
2.	Hold Property Owner and Contractor Workshops	Consultant	May	1997
3.	Start Housing Rehab Program	Consultant	June	1997
4.	Complete Acquisition	Consultant & City	June	1997
5.	Site Bid & Award	City	July	1997
6.	Rehab Units Contracted (4)	Consultant	July	1997
7.	Complete Site Clearance	City	Aug	1997
8.	Rehab Units Contract (4)	Consultant	Aug	1997
9.	Rehab Units Contract (6)	Consultant	Sep	1997

10.	Rehab Units Contract (6)	Consultant	Oct	1997
11.	Rehab Units Contract (6)	Consultant	Nov	1997
12.	Rehab Units Contract (2)	Consultant	Dec	1997
13.	Rehab Units Contract (2)	Consultant	Jan	1998
14.	Rehab Units Contract (6)	Consultant	Feb	1998
15.	Rehab Units Contract (6)	Consultant	Mar	1998
16.	Rehab Units Contract (4)	Consultant	Apr	1998

C. CLOSEOUT

1.	Begin Project Closeout	Consultant	May	1998
2.	Project Evaluation	Consultant	May	1998
3.	Closeout Report	Consultant, City	June	1998
4.	Final Payment to Consultant, Less Retainage	City	July	1998

KEY TO ABBREVIATIONS:

ERR	-	Environmental Review Record
ECO	-	Environmental Certifying Officer
MDOC	-	Department of Commerce
RROF	-	Request for Release of Funds

¹ Signed by Environmental Certifying Officer (see Chapter 2).